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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

ANDREI RAILEANU,)

Defendant.)

Case No. 2:13-cr-0038-APG-PAL

**STIPULATION TO CONTINUE REVOCATION
OF SUPERVISED RELEASE HEARING
(Third Request)**

Certification: In accordance with Local Rule 12-1(c), the parties, by and through undersigned counsel, certify that this stipulation is timely filed.

Pursuant to this Court's Local Rule 45-1, the parties respectfully request that the Court approve this stipulation to continue the date for the January 19, 2016 hearing pertaining to revocation of Defendant Andrei Raileanu's supervised release. The parties request that the Court continue the hearing to a date no earlier than June 2, 2016.

In support of this stipulation, the parties rely upon the following points:

1. The government filed a petition in this case on July 21, 2015 seeking revocation of Mr. Raileanu's supervised release (Pacer #92). Based upon the government's petition, this Court issued an arrest warrant for Mr. Raileanu which was successfully executed on August 19,

2015 (Pacer #95). The petition for revocation of supervised release filed in this case is partly based upon allegations that are currently being litigated/contested in another criminal case involving Mr. Raileanu. *See* United States v. Andrei Raileanu, 2:15-cr-0250-APG-GWF. In fact, trial is scheduled to commence in that case on May 2, 2016.

2. In the interest of judicial economy, the parties agree that continuing the current date for the revocation hearing in this case is appropriate, especially in light of the upcoming trial in the 15-0250 case. Mr. Raileanu, who is currently in custody, concurs with this request for a continuance.

3. The parties agree that the revocation hearing in this case should be continued to a date no earlier than June 2, 2016.

/s/ Kimberly M. Frayn

Kimberly M. Frayn, Esq.

Attorney for the United States

Dated: January 14, 2016

Respectfully submitted,

/s/ Paul S. Padda

Paul S. Padda, Esq.

Attorney for the Defendant

Dated: January 14, 2016

IT IS SO ORDERED:

The Court hereby approves the parties' stipulation seeking to continue the supervised release hearing currently scheduled for January 19, 2016 in United States v. Andrei Raileanu, 2:13-cr-0038-APG-PAL. The hearing shall be continued to the following date and time:

Date: June 15, 2016

Time: 10:00 a.m. in Courtroom 6C



UNITED STATES DISTRICT JUDGE

DATED: January 14, 2016

CERTIFICATE OF SERVICE

In compliance with the Court's Local Rules, the undersigned hereby certifies that on January 14, 2016 a copy of the foregoing document, "STIPULATION TO CONTINUE REVOCATION OF SUPERVISED RELEASE HEARING" was served (via the Court's CM/ECF system) upon all counsel of record in this matter.

/s/ Paul S. Padda

Paul S. Padda, Esq.